

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**  
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FORTESSA QORROLI,

CIVIL ACTION NO. 18 CV 6836  
(DLC)(OTW)

**DEFENDANTS' COUNSEL'S  
DECLARATION IN  
OPPOSITION**

Plaintiff,  
-against-

METROPOLITAN DENTAL ASSOCIATES, D.D.S. – 225  
BROADWAY, P.C.,  
METROPOLITAN DENTAL ASSOCIATES, D.D.S., P.C.,  
MARIO ORANTES, individually, and  
DR. PAUL I. COHEN, individually,

Defendants.

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**DAVID C. WIMS**, declares that the following is true and correct under penalty of perjury

pursuant to 28 U.S.C. § 1746:

1. I am admitted to practice before this Court and I am the attorney for Defendants in the instant proceeding.
2. I submit this *Declaration* in opposition to Plaintiff's post-trial motion under Fed.R.Civ.P. 59.
3. The basis for my submission of the attached documents is my review of the case file, the parties' documents and records, and first-hand knowledge.
4. Defendants wish to place before the Court:
  - i. the trial transcript in this matter from February 6, 2023 through February 9, 2023.

Dated: Brooklyn, New York

April 7, 2023

/s/

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LAW OFFICE OF DAVID WIMS

David C. Wims, Esq. (DW-6964)

*Attorneys for Defendants*

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